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UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA

In Re: WAKIN AND CECILIA DAVENPORT
DEBTOR(S)

Case No. 09-46883-E-13L
DC No. MOH-2

DATE: FEBRUARY 23, 2010
TIME: 1:00 PM
COURTROOM: 33
JUDGE SARGIS

DEBTORS' MOTION TO VALUE
COLLATERAL OF APEX FINANCIAL
MANAGEMENT


Debtors Wakin and Cecilia Davenport respectfully request a determination that the value of the collateral securing their debt to Apex Financial Management, namely heating and air conditioning units and ductwork, has a value of \$6,000.00. The grounds for relief are as follows:

1) Debtors contracted 2/20/07 with Gallaghers Heating and Air Conditioning to have a new heating and air unit, or units, along with ductwork, installed in their residence for the original sum of \$11,955. with deferred interest. The debt was sold to GE Money Bank and is now in the hands of Apex Financial Management. After two years and nine months of use the units have substantially depreciated, and Debtors believe that the resale value of the removed merchandise would not exceed \$6,000.00 and respectfully request that the Court determine \$6,000.00 to be the value of the collateral. The DECLARATION OF DEBTOR Cecilia Davenport will be filed in support of this motion and is

1 hereby incorporated by reference as EXHIBIT A.

2 Respectfully submitted,

3 Date: 1/26/10

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MICHAEL O. HAYS
Attorney for Debtors